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AVCP
Association of Village Council Presidents
Administration
Pouch 219, Bethel, AK 99559

The Voice of the Region



Akiachak
Akiak
Alakanuk
Andreafski
Aniak
Atmautluak
Bethel
Bill Moore's Sl.
Cheforak
Chevak
Chuathbaluk
Chuloonawick
Crooked Creek
Eek
Emmonak
Georgetown
Goodnews Bay
Hamilton
Hooper Bay
Lower Kalskag
Upper Kalskag
Kasigluk
Kipnuk
Kongiganak
Kotlik
Kwethluk
Kwigillingok
Lime Village
Marshall
Mekoryuk
Mtn. Village
Napaimute
Napakiak
Napaskiak
Newtok
Nightmute
Nunakauyak
Nunam Iqua
Nunapitchuk
Ohogamiut
Oscarville
Paimiut
Pilot Station
Pitka's Point
Platinum
Quinhagak
Red Devil
Russian Mission
Scammon Bay
Sleetmute
St. Mary's
Stony River
Tuluksak
Tuntutuliak
Tununak
Umkumiut

July 5, 2017

Federal Communication Commission
442 West 12th Street, SW
Washington, D.C. 20554

Re: WC Docket 17-114

Dear Commissioner Pai,

The Association of Village Council Presidents (AVCP) is a tribal consortium of 56 federally recognized tribes in the Yukon Kuskokwim Delta (YK-Delta). The YK-Delta is approximately 59,000 square miles and is roughly the size of the State of New York. There are 48 physical communities in the YK-Delta, accessible to each other only by boat on the Yukon and Kuskokwim rivers, by truck when the rivers are frozen, or by small plane. The entire region is "off the road system" – accessible to the rest of Alaska only by plane. The region's population is approximately 25,000 and 85% Alaska Native. AVCP provides social and economic development services to individuals, families, communities, and the region as a whole.

One challenge facing the AVCP region is connection between communities, sub-regional "hubs" (or centers), the main "hub" of Bethel, and outside of our region (Anchorage, the Lower 48, etc.). With the difficulties (flight schedules, weather delays, sometimes dangerous traveling conditions) and expense (with roundtrip tickets from some villages to Bethel routinely exceeding \$500) in bringing people to the services and opportunities they need, AVCP struggles to effectively carry out its mission. Each village is like an "island" in the sea of Western Alaska. AVCP needs to be able to use technology – high speed internet, video conferencing capabilities, web meetings – to connect with clients, employees, and tribes throughout the region.

To date, the AVCP Region has been part of a high speed broadband terrestrial project known as the TERRA Project. Despite the ground gained from this project, it does not come close to resolving the region's technology infrastructure deficiencies. It is just the beginning of bridging the technology gap that exists in providing a continuous range of essential services.

AVCP will be unable to completely resolve its technology-related service delivery obstacles, without fundamentally changing the technology infrastructure available in the YK-Delta. The proposed merger of General Communications Inc. (GCI) with Liberty Ventures Group to form GCI-Liberty can only be successful if it will result in telecommunication services that are accessible and affordable to individuals, Tribes, and Tribal organizations in rural Alaska.

In considering the proposed transfer, please be mindful of the unique needs in rural Alaska. AVCP hopes that a decision will be made that will lay the groundwork for creating the technology

infrastructure that will connect individuals, communities, and whole regions in Alaska – not only to each other, but the global community.

Sincerely,

ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS

A handwritten signature in black ink that reads "Vivian Korthuis". The signature is written in a cursive style with a large initial "V".

Vivian Korthuis
CEO